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February 18, 2011

VIA FEDEX

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Suite TW-A325 Washington, D.C. 20554

Re: Farmers Telecommunications Cooperative, Inc., and

Farmers Telecommunications Corporation, Inc

Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification

EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of, Farmers Telecommunications Cooperative, Inc., and Farmers Telecommunications Corporation, Inc we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also provided one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 09-9 (released January 7, 2009).

Please contact me if you have any questions regarding this matter.

Very truly yours,

Christopher E. Townson

Manager of Customer Service & Support

Farmers Telecommunications Cooperative, Inc.

144 McCurdy Avenue North Rainsville, Alabama 35986 Telephone: (256) 638-2144 Facsimile: (256) 638-4830

Email: ctownson@staff.farmerstel.com

Enclosure

cc: Cathy Davis

Best Copy and Printing, Inc.

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Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, D.C. 20554

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2010 EB Docket No. 06-36;

Form 499 Filer ID 803427-Farmers Telecommunications
Cooperative, Inc.,
Form 499 Filer ID 821126-Farmers Telecommunications
Corporation, Inc., and

CERTIFICATION

I, <u>Christopher E. Townson</u>, hereby certify that I am an officer of the companies named above, hereinafter referred to as "FTC", and acting as an agent of FTC that I have personal knowledge that FTC has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

I have personal knowledge that FTC obtains written approval for the use of its customers' CPNI and that FTC has notified its customers of their right to restrict FTC's use of, disclosure of and access to their CPNI prior to obtaining such written approval.

I have personal knowledge that FTC has implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication

system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the rules.

Name: Christopher E. Townson

Title: Assistant Secretary Date: February 18, 2011

Company Name ("Carrier"): Farmers Telecommunications Cooperative, Inc.

Farmers Telecommunications Corporation, Inc.

Address: 144 McCurdy Avenue North

P. O. Box 217

Rainsville, AL 35986-0217

STATEMENT

Carriers have established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carriers have implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carriers continually educate and train its employees regarding the appropriate use of CPNI. Carriers have established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carriers maintain a record of its and its affiliates' sales and marketing campaigns that use
 its customers' CPNI. Carriers also maintain a record of any and all instances where CPNI
 was disclosed or provided to third parties, or where third parties were allowed access to
 CPNI. The record includes a description of each campaign, the specific CPNI that was
 used in the campaign, and what products and services were offered as a part of the
 campaign.
- Carriers have established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carriers took the following actions against data brokers in 2010, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: N/A.

- The following is information Carriers have with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: N/A.
- The following is a summary of all customer complaints received in 2010 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2010 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: ___0___
 - Category of complaint:

<u>N/A</u> Number of instances of improper access by employees

<u>N/A</u> Number of instances of improper disclosure to individuals not authorized to receive the information

<u>N/A</u> Number of instances of improper access to online information by individuals not authorized to view the information

N/A Number of other instances of improper access or disclosure

Description of instances of customer complaints, improper access or disclosure:
 N/A.